



April 28, 2021

**VIA ECF**

Hon. Deborah L. Boardman  
United States District Court  
101 West Lombard Street, 3C  
Baltimore, Maryland 21201

Re: *Johnson v. Baltimore Police Department et al.*  
No. ELH-19-0698

Dear Judge Boardman:

Pursuant to your Letter Order of March 8, 2021 (ECF No. 84), we write regarding a discovery dispute that the parties have been unable to resolve despite good-faith efforts to do so.

The parties have a dispute regarding Plaintiff's assertion of work product protections to interviews with third-party witnesses. Specifically, this issue arose at an April 13, 2021 deposition, and the parties anticipate the issue potentially arising again at future depositions. Each side will submit its own position paper to articulate the nature of the dispute and its relative position.

On April 22, 2021, counsel for Plaintiff (Kobie Flowers and Neel Lalchandani) met and conferred via Zoom with counsel for the Individual Defendants (Judson Arnold) and BPD (Kara Lynch). The parties have been unable to agree to a resolution.

Respectfully,

/s/

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